

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JAMES CONTANT, et al.,	:	
	:	
Plaintiffs,	:	17 Civ. 3139 (LGS)
	:	
— against —	:	[Rel. 13 Civ. 7789 (LGS)]
	:	
BANK OF AMERICA CORPORATION, et al.,	:	ORAL ARGUMENT REQUESTED
	:	
Defendants.	:	
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**NOTICE OF FOREIGN DEFENDANTS’ MOTION
TO DISMISS THE COMPLAINT
FOR LACK OF PERSONAL JURISDICTION**

PLEASE TAKE NOTICE that, upon the accompanying Foreign Defendants’ Memorandum of Law in Support of Their Motion to Dismiss the Second Amended Complaint for Lack of Personal Jurisdiction, dated December 20, 2018; the accompanying Declaration of Eric J. Stock in support of Foreign Defendants’ Motion to Dismiss for Lack of Personal Jurisdiction, dated December 20, 2018, and the Exhibits thereto; and all prior pleadings, papers, and proceedings herein, that:

Defendants Barclays Bank PLC, BNP Paribas Group, Credit Suisse Group AG, HSBC Bank plc, MUFG Bank, Ltd. (f/k/a The Bank of Tokyo-Mitsubishi UFJ, Ltd.), The Royal Bank of Scotland plc, Société Générale, Standard Chartered Bank, and UBS AG (collectively, the “Foreign Defendants”), by their undersigned counsel, hereby move this Court, before the Honorable Lorna G. Schofield, United States District Judge for the Southern District of New York, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007 (the “Court”), on a date and time to be determined by the Court, for an order pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, dismissing all claims against them in the

Second Consolidated Class Action Complaint filed November 28, 2018 (ECF 183), for lack of personal jurisdiction, and for such other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's Order, filed November 16, 2018 (ECF 176), Plaintiffs shall file any response to this Rule 12(b)(2) motion to dismiss no later than January 28, 2019, and the Foreign Defendants shall file any reply in support of this motion no later than February 19, 2019.

PLEASE TAKE FURTHER NOTICE that the Foreign Defendants request oral argument in connection with this Rule 12(b)(2) motion to dismiss.

Dated: New York, New York
December 20, 2018

Respectfully submitted,

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